

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- AGAINST -

OUMAR ISSA, HAROUNA TOURE AND  
IDRISS ABDELRAHMAN,

DEFENDANTS.

**NOTICE OF MOTION**

09 Cr. 1244 (RJH)

PLEASE TAKE NOTICE that upon the annexed affirmation of Zachary Margulis-Ohnuma dated Dec. 17, 2010, the accompanying Memorandum of Law and *Ex Parte* Affirmation, defendant Idriss Abdelrahman will move this Court, the Hon. Richard J. Holwell, in courtroom 17B, 500 Pearl Street, New York, New York 10007 on the 11th day of March, 2011 at 9:30 a.m. or as soon thereafter as counsel can be heard, for an order:

- (i) DISMISSING the Indictment;
- (ii) SUPPRESSING the post-arrest statement of defendant; and
- (iii) COMPELLING the testimony of material witnesses Muhammed Toure and Yacouba Abdelrahman.

Dated: New York, New York  
December 17, 2010

  
\_\_\_\_\_  
Zachary Margulis-Ohnuma (ZM-\_\_\_\_\_  
260 Madison Avenue, 17th Floor  
New York, New York 10016  
(212) 685-0999  
*Counsel for Def. Idriss Abdelrahman*